

Dallas ~~and~~ Fort Worth
International Airport

Vernell Stums
Executive Director

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92-77

July 7, 1992

The Honorable Alfred C. Sikes
Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Chairman Sikes:

The Dallas/Fort Worth International Airport Board, which was created by the Cities of Dallas and Fort Worth, Texas, and is responsible for the administration, management and operation of Dallas/Fort Worth International Airport, hereby submits comments on the Federal Communications Commission's Notice of Proposed Rulemaking 92-169, dated May 8, 1992, on the question of whether to implement "Billed Party Preference", a proposal whose intent is to benefit the consumer by automatically routing 0+ telephone calls to the billed party's preferred long-distance provider from public pay telephones.

The DFW Airport Board opposes "Billed Party Preference" out of its vital interest in, and concern for, the traveling public in general, and the nearly 50 million airline passengers that use DFW Airport annually. The DFW Airport Board believes the proposed "Billed Party Preference" rule eliminates long distance telephone carrier assignment based on contractual arrangements for operator assisted interLATA calls. Moreover, DFW Airport has existing contractual relationships with inter-exchange long distance telephone carriers. The "Billed Party Preference" rule has numerous negative implications for DFW Airport airline passengers and patrons alike. Yet each of these implications, could be resolved through the full implementation of the Telephone Operator Consumer Services Act of 1990.

Overview

Dallas/Fort Worth International Airport and other major U.S. hub airports are singularly unique commercial and operating environments. For the business traveler especially, it is vital that adequate public telephone service be available within airport terminals in order to facilitate the placement of multiple long distance telephone calls within a compressed period of time. Moreover, a review of the daily operating profile of these hub airports will show that conditions vary from airport to airport. To the business traveler that may be rushing to board a connecting or departing flight, time is critical. In today's competitive and often combative business environment, time is money; and unnecessary delay only adds to the level of frustration.

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The federal government requires that airports like Dallas/Fort Worth be self-supporting. The "Billed Party Preference" rule, if implemented, would only add to the number of existing federal regulations that govern the operation of the nation's airports. In turn, this makes it increasingly difficult for airport operators to provide the kind of economic benefits and opportunities to airport visitors and airline business and vacation passengers.

Service Degradation

Under "Billed Party Preference" there is little incentive for long distance telephone carriers to research, develop and introduce enhanced equipment, technology and services. In the event enhanced equipment, technology and services are introduced, the Interexchange Carriers will instruct their customers to dial access codes to bypass airport long distance pay telephone facilities. Additionally, there is a possibility that as a direct result of "Billed Party Preference" fewer public telephones will be available for use by the traveling public within airport terminals, as locations within terminal buildings currently used for public telephone installations will be converted to use by revenue generating concessions. Finally, research has shown that the business traveler, which is estimated to be 60 percent of the airline passenger traffic using DFW annually, has become accustomed to, and indeed expects, a variety of enhanced equipment, technology and services that may be adversely affected by "Billed Party Preference."

Use Of Commercial Credit Cards

Holders of commercial credit cards (American Express, Diners Club, Discovery, Master Card, Optima, Visa, etc.) do not have designated Interexchange Carrier preference. Therefore, business travelers attempting to use recognized, major commercial credit cards may experience significant delays in placing long distance telephone calls from public telephones. Further, anyone desiring to use a commercial credit card would be able to do so only if the card issuer had previously determined the cardholder's Interexchange Carrier preference, a process that could take years.

Access By Foreign Travelers

Nearly three million international travelers use DFW Airport annually. To deny these visitors to the United States access to domestic and/or international long distance service via public telephone would be a national disgrace. Inasmuch as no international network has been implemented, how would "Billed Party Preference" apply to these foreign travelers?

Increased End User Costs

According to Interexchange research, costs associated with "Billed Party Preference" must be borne by someone, probably the end user. "Billed Party Preference" may have the effect of generating telephone rate increases in order to offset these additional costs.

Processing Of O+ or O- Telephone Calls

To both business and vacation travelers, time is both critical and of the essence. Any delay in the placement of long distance telephone calls from public telephones, especially at peak periods of arrivals and departures, which is characteristic of most international hub airports, is not acceptable. Delay may result in a missed flight connection; and the placement of multiple telephone calls by a single user may become intolerable.

Reduction In Telephone Concession Revenue

The Dallas/Fort Worth International Airport Board has a fiduciary responsibility to the Cities of Dallas and Fort Worth to maximize business development at DFW Airport. Any diminishment in revenues has a direct impact on airline landing fees. In turn, increased business costs are passed on to the airline passenger in the form of increased air fare costs.

"Billed Party Preference" discourages Interexchange Carriers from remitting commissions to an airport operator landlord notwithstanding the fact that prime terminal space is dedicated to the purpose of providing convenient, semi-private public telephone facilities to the airport patron. If implemented, "Billed Party Preference" may discourage if not eliminate outright planned or proposed service enhancements that would benefit the consumer.

Loss Of Civic Programs

"Billed Party Preference" may ultimately result in the loss of certain civic programs and related passenger services that benefit the mentally and/or physically challenged airline passenger and/or airport patron, including but not limited to the following services at DFW Airport:

- Telecommunications Devices for the Deaf (TDD)
- DFW Assistance Center
- DFW Airport Community United Negro College Fund Campaign
- DFW Airport Community Disadvantaged Business Enterprise Fair
- DFW Airport Minority Advisory Council

Hon. Alfred E. Sikes
page four

In conclusion, the Dallas/Fort Worth International Airport Board believes it is appropriate to remind the Federal Communications Commission that airports large and small are important public service centers that operate in an environment that is strictly controlled and regulated by the federal government for the benefit of the public at large. The DFW Airport Board believes it is essential that the Federal Communication Commission insist that any new Rule affirmatively benefit the public at large. "Billed Party Preference" does not accomplish this goal. The DFW Airport Board believes that airport operator landlords receive adequate compensation and fair treatment for the pivotal role they play in providing premium space and prime locations within terminal building locations for the installation of essential public telephone services.

If "Billed Party Preference" is enacted, there may be a reduction in the number of public telephones available in airport terminals nationwide as this space is reallocated to business activities that provide a higher financial return to local airport operators. Unfortunately, what public telephone service remains may not be as available or economical when compared to the level of service extant today.

The Dallas/Fort Worth International Airport Board respectfully requests the Federal Communications Commission refrain from implementing "Billed Party Preference" unless and until the public benefits of "Billed Party Preference" are clearly established and a regulatory system assuring fair and reasonable compensation to local airport operators has been implemented.

Sincerely,

A handwritten signature in dark ink, appearing to read "Vernell" followed by a stylized surname.

Vernell Sturns
Executive Director